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July 8, 2022

**MEMORANDUM ENDORSED**

The Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: Schansman et al. v. Sberbank of Russia PJSC et al., Case No. 19-cv-2985-ALCGWG; Sberbank's Russian Counsel's Letter Informing on Status of Engagement of Replacement Counsel

Dear Judge Gorenstein:

I represent Russian law firm Kucher Kuleshov Maximenko & Partners ("KKMP") which is assisting Sberbank of Russia ("Sberbank") with coordinating this litigation, including the issues of engaging a replacement counsel in these proceedings.

I, as Managing Partner of KKMP, have personal knowledge of Sberbank's efforts to engage such replacement counsel and would like to inform you on the following.

I confirm that the replacement counsel has already been identified and engaged as of July 6, 2022.

According to the terms of the engagement, the replacement counsel will file a notice of appearance with this Court once the retainer is received on counsel's bank account.

On July 7, 2022 Sberbank transferred to KKMP the funds for the purposes of further payment of a retainer to the replacement counsel.

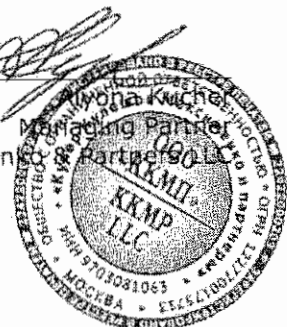
The payment will be made by KKMP to the replacement counsel as soon as possible once the KKMP's Russian bank has authorized foreign currency payment outside Russia.

I hereby respectfully request the Court maintain the *status quo* until the new counsel for Sberbank files a notice of appearance.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 8, 2022

Kucher Kuleshov Maximenko



This letter does not comply with the Court's Order of June 29, 2022 (Docket # 374). Thus, Sberbank of Russia PJSC is in default. Nonetheless, in light of the fact that the July 8 deadline in Docket # 374 was not entirely ignored, plaintiffs shall hold off on filing any motion for a default judgment before Judge Carter until on or after July 26, 2022, inasmuch as the Court would likely extend the deadline in Docket # 384 nunc pro tunc (resulting in vacatur of the entry of default) should an attorney file a notice of appearance before July 26, 2022.

So Ordered.

  
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GABRIEL W. CORENSTEIN  
United States Magistrate Judge

July 12, 2022